

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ISRAEL BOLLAG, individually and on behalf of  
all others similarly situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, J.P. MORGAN SECURITIES  
INC., UBS AG, CIBC WORLD MARKETS CORP.  
and WR HAMBRECHT & CO., LLC,

Defendants.

07 Civ. 3994 (LTS)

LEO YEN, individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, ZHU SHAN, GRAHAM  
EARNSHAW, ALOYSIUS T. LAWN, JOHN H.  
SPRINGER, ZHAO LI, LONG QIU YUN, J.P.  
MORGAN SECURITIES, INC., UBS AG, CIBC  
WORLD MARKETS CORP., and W.R.  
HAMBRECHT & COMPANY, LLC.,

Defendants.

07 Civ. 4046 (LTS)

Swain J.

USDC SDNY	DOCUMENT
ELECTRONICALLY FILED	
DOC #:	
DATE FILED: JUL 23 2007	

**JOEL DARRAS, individually and on behalf of  
all others similarly situated,**

Plaintiff,

**07 Civ. 4144 (LTS)**

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, J.P. MORGAN SECURITIES,  
INC., UBS AG, CIBC WORLD MARKETS CORP.,  
and WR HAMBRECHT & CO.,**

Defendants.

**ALTON PARTNERS, on behalf of itself and  
all others similarly situated,**

Plaintiff,

**07 Civ. 4443 (LTS)**

vs.

**XINHUA FINANCE MEDIA LIMITED, FREDY  
BUSH and SHELLY SINGHAL,**

Defendants.

**BRICKMAN INVESTMENTS, on behalf of itself and all others similarly situated,**

Plaintiff,

07 Civ. 4719 (LTS)

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH, SHELLY SINGHAL, J.P. MORGAN SECURITIES, INC., UBS AG, CIBC WORLD MARKETS CORP., and WR HAMBRECHT & CO.,**

Defendants.

**BLOOMFIELD, INC., on behalf of itself and all others similarly situated,**

Plaintiff,

07 Civ. 4727 (LTS)

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH and SHELLY SINGHAL, J.P. MORGAN SECURITIES INC., UBS AG, CIBC WORLD MARKETS CORP., and W.R. HAMBRECHT & COMPANY, LLC,**

Defendants.

**JIAJU CHU, individually and On Behalf of All Others Similarly Situated,**

Plaintiff,

07 Civ. 6145 (LTS)

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH and SHELLY SINGHAL, J.P. MORGAN SECURITIES INC., UBS AG, CIBC WORLD MARKETS CORP., and W.R. HAMBRECHT & CO.,**

Defendants.

**STIPULATION AND ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to the captioned actions, that:

1. The Complaints in each of the above-captioned actions have been served upon each Defendant and Defendants hereby accept service of the above captioned complaints pursuant to FRCP 4. Defendants hereby reserve all of their rights, defenses and/or objections to the Complaint with the exception of objecting to service of process which is specifically waived. Nothing herein shall be construed to be an admission or acceptance of service in any action other than the above-captioned actions;
2. Defendants' time to move, answer or otherwise respond to the Complaints is extended without date;
3. Lead plaintiff will file and serve a Consolidated Amended Complaint within 60 days after entry of the Court's order appointing a lead plaintiff and designating lead counsel; and
4.
  - a. Defendants will serve and file their response to the Consolidated Amended Complaint within 60 days of the service thereof;
  - b. In the event that Defendants move to dismiss the Consolidated Amended Complaint, lead plaintiff will file and serve opposition papers within 60 days of service of the motion; and
  - c. Defendants will file and serve reply papers, if any, within 45 days after service of lead plaintiff's opposition papers.
5. Any and all pretrial conferences scheduled in the above-captioned actions are hereby adjourned *sine die* until after entry of the Court's order appointing a lead plaintiff and designating lead counsel.

Dated: New York, New York  
July \_\_, 2007

BERNSTEIN LIEBHARD & LIFSHITZ, LLP

By: Timothy MacFall  
Sandy A. Liebhard (SL 0835)  
Timothy MacFall (TM 8639)  
Gregory M. Egleston (GE 1932)

10 East 40th Street, 22nd Floor  
New York, New York 10016  
(212) 779-1414

*Attorneys for Plaintiffs*

WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION

By: Gideon A. Schor  
Douglas Clark (DC 8309)  
Gideon A. Schor (GS 5932)

1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
(212) 497-7753

*Attorneys for Defendants*

Xinhua Finance Media Ltd., Fredy Bush, Shelly  
Singhal, Zhu Shen, Graham Earnshaw, Aloysius T.  
Lawn, John H. Springer, Zhao Li, and Long Qiu  
Yun

KAHN GAUTHIER SWICK, LLC

By: Kim E. Miller  
Michael A Swick (MS 9976)  
Kim E. Miller (KM 6996)

12 East 42st Street, 12nd Floor  
New York, New York 10017  
(212) 696-3730

*Attorneys for Plaintiffs*

CLIFFORD CHANCE US LLP

By: Mark Holland  
Mark A. Kirsch (MK 7806)  
Mark Holland (MH 6949)  
Angelique Shingler (AS 6052)

31 West 52<sup>nd</sup> Street  
New York, New York 10019  
(212) 878-8000

*Attorneys for Defendants JP Morgan Securities  
Inc., UBS AG, CIBC World Markets Corp., and  
W.R. Hambrecht Co. LLC*

LERACH, COUGHLIN, STOIA, GELLER  
RUDMAN & ROBBINS LLP

By: David A. Rosenfeld, Esq.  
Samuel H. Rudman (SR 7957)  
David A. Rosenfeld (DR 7564)

58 South Service Road, Suite 200  
Melville, NY 11747  
(631) 367 7100

*Attorneys for Plaintiffs*

ZWERLING, SCHACHTER & ZWERLING, LLP

By: Richard A. Speirs, Esq.  
Richard A. Speirs (RS 8872)  
Shaye J. Fuchs (SF 9412)

41 Madison Avenue  
New York, New York 11747  
(212) 223-3900

*Attorneys for Plaintiffs*

BRODSKY & SMITH LLC

By: Evan J. Smith, Esq.  
Evan J. Smith (ES-3254)

240 Mineola Boulevard  
Mineola, New York 11501  
(516) 741-4977

*Attorneys for Plaintiffs*

KAPLAN FOX & KILSHEIMER LLP

By: Frederic S. Fox Jr. 7/23/07

Robert N. Kaplan (RN 3100)  
Frederic S. Fox (FF 9102)  
Linda P. Nussbaum (LN 9336)  
Jeffrey P. Campisi (JC 7264)

805 Third Avenue, 22nd Floor  
New York, New York 10022  
(212) 687-1980

*Attorneys for Plaintiffs*

GLANCY BINKOW & GOLDBERG LLP

By: Lionel Z. Glancy Jr. 7/23/07

Lionel Z. Glancy  
Michael Goldberg

1801 Avenue of the Stars, Suite 311  
Los Angeles, California 90067  
(310) 201-9150

*Attorneys for Plaintiffs*

SO ORDERED:

JFK 7/23/2007  
U. S. D. J.